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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

J.L., C.B., K.S., P.M., N.G., R.F., J.D., and G.R.  
individually, and on behalf of all other similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

CASE NO.: 3:23-cv-03440-AMO

**CLASS ACTION**

**NOTICE OF INTENT TO FILE FIRST  
AMENDED COMPLAINT IN LIEU OF  
OPPOSITION TO DEFENDANT'S  
MOTION TO DISMISS COMPLAINT**

COMPLAINT FILED: July 11, 2023

1 TO ALL PARTIES AND COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 15, Plaintiffs J.L.,  
3 C.B., K.S., P.M., N.G., R.F., J.D., and G.R. (“**Plaintiffs**”) intend to file a first amended complaint  
4 (“**FAC**”) in lieu of opposing Defendant Google LLC’s (“**Defendant**”) motion to dismiss Plaintiffs’  
5 class action complaint (“**CAC**”) (ECF 20) (the “**Motion**”).

6 Defendant filed the Motion on October 16, 2023, and Plaintiffs’ opposition would have been  
7 due on October 30, 2023. However, Plaintiffs exercise their right to amend the CAC as a matter of  
8 course pursuant to Fed. R. Civ. P. 15(a)(1)(B). Plaintiffs anticipate filing a stipulation regarding  
9 Plaintiffs’ deadline to amend the CAC, and intend to file the FAC on or before the date approved  
10 by the Court.

11  
12 DATED: October 30, 2023

**CLARKSON LAW FIRM, P.C.**

13 /s/ Yana Hart

14 Ryan J. Clarkson, Esq.

15 Yana Hart, Esq.

Tracey Cowan, Esq.

16 *Attorneys for Plaintiffs and the Proposed Classes*  
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